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Deutsche Bank Aktiengesellschaft,
John Cryan, Christian Sewing,
Marcus Schenck, and James Von Moltke

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALI KARIMI, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

DEUTSCHE BANK
AKTIENGESELLSCHAFT, JOHN CRYAN,
CHRISTIAN SEWING, MARCUS
SCHENCK, and JAMES VON MOLTKE,

Defendants.

Case No. 2:20-cv-08978

Hon. Esther Salas, U.S.D.J.

Hon. Michael A. Hammer, U.S.M.J.

**REPLY DECLARATION OF DAVID
G. JANUSZEWSKI IN FURTHER
SUPPORT OF DEFENDANTS'
MOTION TO TRANSFER
PURSUANT TO 28 U.S.C. § 1404(a)
OR, IN THE ALTERNATIVE,
DISMISS PLAINTIFFS' SECOND
AMENDED CLASS ACTION
COMPLAINT**

I, DAVID G. JANUSZEWSKI, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am admitted *pro hac vice* to appear before this Court and am a member of the law firm CAHILL GORDON & REINDEL LLP, attorneys for Defendants Deutsche Bank Aktiengesellschaft (“Deutsche Bank”), John Cryan, Christian Sewing, Marcus Schenck, and James Von Moltke in the above-captioned action. I submit this declaration to place before the Court a publicly available document that is referenced in Plaintiffs’ Second Amended Complaint as well as the accompanying Reply Memorandum of Law in Support of Defendants’ Motion to transfer this action to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404(a), or in the alternative, dismiss the Plaintiffs’ Second Amended Class Action Complaint.

2. Annexed hereto as Exhibit 1 is a true and correct copy of the August 3, 2018 Reuters article titled “Exclusive: Deutsche Bank reports show chinks in money laundering armor” by Edward Taylor, Tom Sims, and John O’Donnell, available at <https://www.reuters.com/article/us-deutsche-bank-moneylaundering-exclusi/exclusive-deutsche-bank-reports-show-chinks-in-money-laundering-armor-idUSKBN1KO0ZC>.

Executed on: July 1, 2021
Edgartown, Massachusetts



David G. Januszewski